

EXHIBIT 14

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON ISSUES OF INFRINGEMENT AND DEFENDANTS' INVALIDITY DEFENSES

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SIGNIFY NORTH AMERICA	:	
CORPORATION and SIGNIFY HOLDING	:	
B.V.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION FILE
	:	NUMBER:
versus	:	2:22-cv-2095
	:	
LEPRO INNOVATION INC., LE	:	
INNOVATION INC., INNOVATION	:	
RULES INC., HOME EVER INC., and	:	
LETIANLIGHTING, INC.,	:	
	:	
Defendants.	:	

VIDEOTAPED DEPOSITION OF
JOHN W. CURRAN, PH.D.

Volume I

9:30 a.m.
October 15, 2024

REGUS BUSINESS CENTER
100 Bull Street
Second Floor
Savannah, Georgia

Job No.: 556580
Pages: 1 - 245

Stenographically Reported By:
Susan DiFilippantonio, RPR, RMR, California CSR 14383

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Also Present: Matthew Simpson, videographer
Eyal Filkovsky, technician
Aaron Rugh, in-house counsel Signify
Gary Yen, in-house counsel Signify
(via videoconference)

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(Tuesday, October 15, 2024 9:30 a.m.)

09:30:46

TECHNICIAN: Thank you to everyone for attending this proceeding remotely, which we anticipate will run smoothly. Please remember to speak slowly and do your best not to talk over one another. Please be aware that we are recording this proceeding for backup purposes. Any off-the-record discussions should be had away from the computer. Please remember to mute your mic for those conversations. Please have your video enabled to help the reporter identify who is speaking. If you are unable to connect via -- with video and are connecting via phone, please identify yourself each time before speaking. I apologize in advance for any technical-related interruptions. Thank you.

09:29:33

09:29:34

09:29:36

09:29:39

09:29:42

09:29:44

09:29:48

09:29:49

09:29:53

09:29:55

09:29:58

09:30:01

09:30:04

09:30:07

09:30:10

THE VIDEOGRAPHER: Okay. Stand by for video read-on.

09:30:11

09:30:13

Here begins Media Number 1 in the videotaped deposition of John W. Curran, Ph.D., in the matter of Signify North America Corporation, et al. v. Lepro Innovations Inc., et al., in the United States District Court for the District of Nevada, Case Number 2:22-cv-02095.

09:30:20

09:30:22

09:30:26

09:30:31

09:30:34

09:30:35

Today's date is October 15, 2024. The

09:30:41

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1	time on the video monitor is 9:30 a.m.	09:30:44
2	Videographer today is Matthew Simpson, representing	09:30:48
3	Planet Depos. This video deposition is taking	09:30:52
4	place at 22 Bull Street, Third Floor, Savannah,	09:30:54
5	Georgia 31401.	09:30:57
6	Would counsel please voice-identify	09:30:59
7	themselves and state whom they represent.	09:31:02
8	MR. SWAIN: Good morning. This is Adam	09:31:03
9	Swain on behalf of Plaintiff Signify, from the law	09:31:06
10	firm of Alston & Bird.	09:31:09
11	MR. OCZEK: Jeremy Oczeck and Jonathan	09:31:12
12	Gray with the law firm Bond Schoeneck & King,	09:31:15
13	representing Plaintiff Signify.	09:31:16
14	MR. SWAIN: And -- and I also want to say	09:31:19
15	that Mr. Aaron Rugh, in-house counsel for Signify,	09:31:21
16	is in the room, as well. And also Gary Yen, also	09:31:24
17	in-house counsel for Signify, is on the Zoom	09:31:26
18	meeting.	09:31:28
19	MR. CHEN: Good morning. This is Hua	09:31:29
20	Chen from the law firm of ScienBiziP, PC. I'm here	09:31:31
21	representing the Lepro defendants in this case.	09:31:36
22	THE VIDEOGRAPHER: The Court Reporter	09:31:39
23	today is Susan DiFilippantonio, representing Planet	09:31:41
24	Depos. The witness will now be sworn.	09:31:45
25	JOHN W. CURRAN, PH.D.,	

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1	correct?	14:07:11
2	A. Yes.	14:07:12
3	Q. Okay. But what you didn't do -- and I just want	14:07:12
4	to be clear to triangulate -- you didn't compare any	14:07:15
5	claim of Recker, '686 Patent Recker, to any disclosure	14:07:19
6	in the '556 application of Recker, correct?	14:07:25
7	A. In other -- you're saying I didn't compare	14:07:31
8	anything in '686 to '556.	14:07:37
9	Q. That's correct.	14:07:40
10	A. No, I don't believe I did.	14:07:41
11	Q. Okay. And you didn't compare -- or you didn't	14:07:43
12	map any disclosure of the '556 application to any claim	14:07:48
13	of the Recker '686 Patent, correct?	14:07:52
14	A. Could you ask your question again? Because I	14:08:37
15	think I'm getting myself totally confused here.	14:10:05
16	Q. Sure.	14:10:08
17	I'm hoping this is an easy one. We're just	14:10:09
18	figuring out what your opinions are and what they are	14:10:12
19	not. But you didn't compare any -- you didn't map any	14:10:14
20	disclosure of the '556 application to any issued claim	14:10:19
21	of the Recker '686 Patent, correct?	14:10:23
22	A. I'm referencing '556, you know, through much of	14:10:33
23	these pages.	14:13:23
24	Q. Certainly. Certainly.	14:13:24
25	My question is, are you referencing '556 in	14:13:26

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1	comparing the '556 application to Recker, which is a	14:13:28
2	'68- -- which is the '686 Patent, which has its own	14:13:33
3	claims talking about impedance of circuits and stuff?	14:13:38
4	A. If I understand kind of -- and I do apologize --	14:14:19
5	what you're asking, I mean, a lot of these -- I'm	14:14:42
6	comparing the '556 to the '320.	14:14:47
7	Q. That's absolutely correct. That's why I wanted	14:14:52
8	to clarify. You're comparing the '556 application to	14:14:55
9	the '320 Patent, correct?	14:14:58
10	A. Yeah, because that's -- that's where the claims	14:14:59
11	are, the claims are coming --	14:15:01
12	Q. Right. That's right.	14:15:03
13	A. Okay. I'm sorry.	14:15:04
14	Q. No, no, it's fine. I -- it seemed probably a	14:15:05
15	little strange that I was asking, but I just -- it's on	14:15:07
16	the checklist of things to do.	14:15:09
17	But for the '66 -- but there's also the '686	14:15:10
18	Recker patent, which is also cited prior art, and I just	14:15:14
19	wanted to make sure you weren't comparing the '556	14:15:18
20	applications to Recker '686 Patent, which has its own	14:15:20
21	claims.	14:15:25
22	A. Right. No, the claims that are -- that are	14:15:26
23	shown here in -- in bold on that -- are the claims from	14:15:28
24	the '320.	14:15:31
25	Q. Sure.	14:15:32

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1 And just to be clear, you don't have an opinion 14:15:32
2 as to whether the -- the claims of the '686 Recker 14:15:37
3 patent are met or disclosed by the '556 application in 14:15:41
4 any way, correct? 14:15:47

5 MR. CHEN: Objection. Form. 14:15:48

6 THE WITNESS: No, I didn't -- I didn't 14:15:50
7 form an opinion on that. 14:16:01

8 BY MR. SWAIN: 14:16:04

9 Q. Okay. Thanks. You can put that aside. 14:16:05

10 A. (Complying.) 14:16:08

11 Q. Okay. I'm going to jump around a bit here, 14:16:09
12 Dr. Curran. I want to talk about a different patent, 14:16:15
13 the '604 Patent. Are you familiar with the '604 Patent? 14:16:19

14 A. Yes. 14:16:23

15 Q. Okay. The '604 Patent was originally applied 14:16:24
16 for and obtained by a company called, I believe -- let 14:16:29
17 me double-check that -- yeah, it's TIR Technology. Were 14:16:33
18 you familiar with TIR Technology, TIR? 14:16:40

19 A. I may have heard of it, but nothing that I ever 14:16:44
20 would have -- no, never dealt with them or had any -- 14:16:48
21 any kind of interactions with them. 14:16:54

22 Q. Sure. 14:16:56

23 And I'll introduce the '604 Patent now just so 14:16:56
24 you have it. 14:17:00

25 You know what, before we get on to that, there 14:17:02

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1	Dr. Curran. My question is just to understand -- you	14:19:14
2	know, there's been opinions by Dr. Ricketts and by	14:19:17
3	Signify that the '320 Patent is -- the subject matter	14:19:21
4	and claims are supported by this June 5, 2009, foreign	14:19:26
5	application in China. Are you with me so far?	14:19:31
6	A. Yes, so ignoring whether or not you could file	14:19:35
7	it.	14:19:38
8	Q. Well --	14:19:41
9	A. I mean, I'm saying -- I -- that's not my realm,	14:19:42
10	so let me --	14:19:46
11	Q. Okay. I just want to be clear. Did you -- did	14:19:47
12	you -- did you compare the substance of this -- of the	14:19:49
13	Chinese foreign application of June 5th, 2009, to any of	14:19:52
14	the claims of the '320 Patent?	14:19:56
15	A. No.	14:19:58
16	Q. Okay. And do you have an opinion one way or the	14:19:58
17	other whether the claims of the '320 Patent are	14:20:07
18	supported by the June 5th, 2009, Chinese priority	14:20:09
19	filing?	14:20:13
20	A. No, since I can't see it.	14:20:15
21	Q. Okay. All right. And if you did, it would've	14:20:19
22	been in your report, right?	14:20:23
23	A. Yeah.	14:20:26
24	Q. Okay. That's all.	14:20:26
25	All right. Now the '604 Patent. Okay. All	14:20:29